

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re:	§	Chapter 11
	§	
Entrada Development, LLC	§	Case No. 23-10317
	§	
Debtor	§	

**DECLARATION OF PROPOSED ATTORNEY
AND DISCLOSURE OF COMPENSATION**

1. “My name is Ronald J. Smeberg and I am an attorney with The Smeberg Law Firm, PLLC (“Smeberg Law Firm”) which maintains offices at 4 Imperial Oaks, San Antonio, Texas 78248. I am an attorney at law, duly licensed to practice in the State of Texas and admitted to practice before the United States District Courts for all districts in the State of Texas.

2. To the best of my knowledge, Smeberg Law Firm does not have or represent any interest adverse to Entrada Development, LLC (“Debtor”) or Debtor’s estate, nor does Smeberg Law Firm have any connections with the Debtor, Debtor’s creditors, or any other party in interest, their attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, except the following: None.

3. Smeberg Law Firm is a disinterested person with regard to Debtor in the above-captioned matters in that:

- a. Smeberg Law Firm is not an equity security holder or insider;
- b. Smeberg Law Firm is not and has not been, within two (2) years before the date of the filing of petition, a director, officer, or employee of Debtor; and
- c. Neither Smeberg Law Firm nor any personnel associated with

Smeberg Law Firm have represented an interest adverse to Debtor herein, or its estate, in the matter upon which Smeberg Law Firm is to be engaged.

4. Debtor has no outstanding balance with The Smeberg Law Firm, PLLC.
5. Pursuant to 11 U.S.C. § 329(a) and Bankruptcy Rule 2016(b), I certify that Smeberg Law Firm is the attorney for Debtor and that compensation paid to Smeberg Law Firm within one year before the filing of the petition in bankruptcy, or agreed to be paid to Smeberg Law Firm, for services rendered, or to be rendered, on behalf of Debtor in contemplation of, or in connection with, the bankruptcy case is as follows:

- a. Pre-petition Retainer related to bankruptcy filing: \$12,000.00;
- b. \$1,738.00 of this bankruptcy related retainer was used to pay Debtors' filing fees, and \$906.00 was paid in pre-petition fees related to the bankruptcy filings;
- c. Balance of Retainer (held in Trust) \$9,356.00;

6. The source of compensation to be paid to Smeberg Law Firm is the Debtor;

7. I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.

8. All work for Debtor in regard to its Bankruptcy shall be billed in accordance with Smeberg Law Firm's pending application to employ, and the services rendered to Debtor shall include, but not be limited to:

- i. assist, advise, and represent Debtor in obtaining pre-plan relief;
- ii. assist, advise, and represent Debtor in the confirmation process;
- iii. assist, advise, and represent Debtor in completing monthly MORs;

- iv. assist, advise, and represent Debtor in adversary litigation;
- v. appear, as appropriate, before this Court, the Appellate Courts, and other Courts in which matters may be heard and to protect the interests of the Debtor before said Courts and the United States Trustee; and
- vi. to perform all other necessary legal services in this case.

9. I further state that The Smeberg Law Firm, PLLC has not shared, or agreed to share, compensation from this engagement with any person, or to otherwise violate the fee-splitting prohibition of 11 U.S.C. §504.

10. I declare under penalty of perjury under the laws of the State of Texas and the United States of America that the foregoing is true and correct.”

A handwritten signature in black ink, appearing to read "Ron Smeberg", written in a cursive style.

RONALD J. SMEBERG